

Jonathan Arthur

From: Anne Lahren <alahren@PenderCoward.com>
Sent: Thursday, October 7, 2021 9:45 AM
To: Coreen Silverman; Jonathan Arthur
Cc: Dustin Plumadore
Subject: RE: Protective Order - Nazario v. Gutierrez, et. al.

Thank you!

Anne C. Lahren
ATTORNEY

PENDER & COWARD
ATTORNEYS AND COUNSELLORS AT LAW

(757) 490-6293 | fax (757) 502-7370
alahren@pendercoward.com

Counsel for Crocker consenting to let Counsel for Gutierrez make the amendments.

From: Coreen Silverman <csilverman@hancockdaniel.com>
Sent: Thursday, October 7, 2021 9:44 AM
To: Jonathan Arthur <j.arthur@robertslaw.org>
Cc: Anne Lahren <alahren@PenderCoward.com>; Dustin Plumadore <dplumadore@hancockdaniel.com>
Subject: Re: Protective Order - Nazario v. Gutierrez, et. al.

External Email

We can.

Coreen Silverman, Esq.
Hancock Daniel Johnson, PC
4701 Cox Road, Suite 400
Glen Allen, VA 23060
(804) 967-9704
(804) 955-9007 (mobile)

Gutierrez's Counsel agreeing to make the amendments to the protective order.

Counsel for Defendant Gutierrez requesting changes 16 days after Plaintiff first transmitted the same to them (See Ex. 4).

On Oct 7, 2021, at 9:43 AM, Jonathan Arthur <j.arthur@robertslaw.org> wrote:

I have no problem the protective order provisions being mutual. I believe you both have word copies of the proposed order. Which one of you wants to take a shot at modifying the provisions for mutuality?

-Jonathan

From: Coreen Silverman <csilverman@hancockdaniel.com>
Sent: Thursday, October 7, 2021 9:23 AM
To: Jonathan Arthur <j.arthur@robertslaw.org>; 'Anne Lahren' <alahren@PenderCoward.com>
Subject: RE: Protective Order - Nazario v. Gutierrez, et. al.

Is your client willing to have you, on his behalf, execute a similar Protective Order for his personnel file?

I had an experience yesterday in a deposition, where the judge ordered documents pertaining to a particular issue be filed under seal, due to concerns of them getting into the public. And, to my surprise contents of the documents were disseminated to the Plaintiff's client who then disseminated them, such that a non-party had knowledge of them and commented about them in a deposition yesterday. I was shocked.

We DO NOT want Mr. Gutierrez's personnel file from any of his previous employers to be shared by the Plaintiff with anyone outside of this litigation. This exclusion would include his family and friends, which could lead unlimited dissemination, including on the internet.

From: Jonathan Arthur <j.arthur@robertslaw.org>

Sent: Thursday, October 7, 2021 9:15 AM

To: 'Anne Lahren' <alahren@PenderCoward.com>; Coreen Silverman <csilverman@hancockdaniel.com>

Subject: Protective Order - Nazario v. Gutierrez, et. al.

Counselors:

Please confirm that we are in agreement with the terms of the protective order so that I can submit the same to the Court for entry.

Cordially,

Jonathan M. Arthur, Esq.
Thomas H. Roberts & Associates, P.C.
105 South 1st St.
Richmond, VA 23219
(804)-991-4308 – Direct
(804)-783-2000 – Firm
(804)-783-2105 - Fax

Plaintiff's counsel requesting confirmation on terms of protective order from both sets of Defense Counsel

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We care about the safety and wellbeing of our employees, clients, friends and communities as we serve the needs of our clients. We ask that all employees, clients and guests wear masks in our offices until further notice. For more information on our firm's operations and plan in response to COVID-19, please call us at 757-490-3000. [Click here for helpful COVID-19 articles and resources.](#)